

**UNITED STATES DISTRICT  
COURT SOUTHERN DISTRICT  
OF TEXAS HOUSTON DIVISION**

NANBAM BLESSING DANIEL,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:19-cv-1945
	§	
EZE MADUMERE and MARSHALL	§	
MADUMERE,	§	<b>JURY TRIAL DEMANDED</b>
	§	
Defendants.	§	
	§	

**DEFENDANTS EZE MADUMERE AND MARSHALL MADUMERE'S ANSWER TO  
PLAINTIFF'S COMPLAINT**

ADMISSIONS AND DENIALS

1. Civil Action No. 4:19-cv-1945, Nanbam Blessing Daniel v. Eze Madumere and Marshall Madumere,

2. ANSWER: Admitted

3. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question jurisdiction), 18 U.S.C. § 1595(a) (TVPRA), and 29 U.S.C. § 216(b) (FLSA).

ANSWER: Admitted

4. Declaratory relief is authorized pursuant to 28 U.S.C. §§ 2201 and 2202.

5. ANSWER: Admitted

6. Venue is proper under 28 U.S.C. § 1391 because E. Madumere and M. Madumere reside and/or may be found in this District, and because a substantial portion of the communications, transactions, events or omissions underlying Ms. Daniel's claims occurred in this District.

7. ANSWER: Admitted

8. The Defendants Deny the facts of the underlying lawsuit as stated from line 1 to 4 of the Complaint.

9. The Defendants Deny the Statement of facts of the underlying lawsuit as stated from line 11 to 51 of the Complaint.

10. Defendants lack sufficient knowledge or information to determine the truth of the allegations stated from line 52 to 67 of the complaint.

11. DEFENSES

12. There was never an employer/employee relationship or any intent to enter into such a relationship between Plaintiff and Defendants. Furthermore, Defendants did not gain any financial benefits from the Plaintiff staying at their residence rather they provide free meals and board in addition to allowing plaintiff to use the residence in furtherance of her hair braiding business.

13. Plaintiff came to the United States voluntarily with the intent of making money from hair braiding and eventually relocating her daughter. Plaintiff could have returned to her Native country at any time but she chose not to do so because she overstayed her visa and would not have been able to return to the United States. There was no trafficking, forced labor or involuntary servitude.

14. COUNTERCLAIMS

15. Defamation of character: Defendants Eze Madumere and Marshall Madumere

have suffered irreparable harm from Plaintiff's false allegations. They have been subjected to ridicule and embarrassment in their communities and church as a result of the allegations and subsequent lawsuit. Plaintiff has falsely alleged that Defendants were physically and mentally abusive, trafficked and forced her into labor.

16. Defendants Eze Madumere and Marshall Madumere are asking that Plaintiff Nanbam Blessing Daniel be held liable for Defamation of character.

17. Defendants Eze Madumere and Marshall Madumere are asking that Plaintiff Nanbam Blessing Daniel be held liable for their legal costs in this matter.

18. Defendants Eze Madumere and Marshall Madumere are asking that Plaintiff Nanbam Blessing Daniel be held liable for punitive damages, reasonable attorney's fees, pre-judgment interest, where appropriate, and post-judgment interest and Grant such other relief as the Court deems just and appropriate.

19. Under the penalty of perjury, I certify to the best of my knowledge, information and belief that the foregoing is true and correct.

Dated: June 25, 2019

Respectfully submitted,

By: /s/ Paul Ivonye  
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